

Andrew Williams, Esq.  
CA bar #: 310526 - pro hac vice admit  
**The Williams Law Group**  
6273 Sunset Drive  
Suite D3  
South Miami, Florida 33143  
Telephone: (253) 970-1683  
Email: Andrew@TheWilliamsLG.com

David Lee Phillips, Esq.  
NV bar #: 538 - local counsel  
700 S. 4<sup>th</sup> Street  
Las Vegas, NV 89101  
Telephone: (702) 595-9097  
Email: DavidLeePhillips@aol.com

*Attorneys for Plaintiff, Steven  
Johnson*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

STEVE JOHNSON

Plaintiff,

v.

HILV FEE, LLC; NAV-115 E. TROPICANA,  
LLC; LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT; LAS VEGAS METROPOLITAN  
POLICE OFFICER A; LAS VEGAS  
METROPOLITAN POLICE OFFICER B; LAS  
VEGAS METROPOLITAN POLICE OFFICER C;  
LAS VEGAS METROPOLITAN POLICE  
OFFICER D; LAS VEGAS METROPOLITAN  
POLICE OFFICER E; LAS VEGAS  
METROPOLITAN POLICE OFFICER F; LAS  
VEGAS METROPOLITAN POLICE OFFICER G  
and DOES 9 to 50

Defendants.

Case No. 2:18-cv-01381-RFB-BNW

**PLAINTIFF'S SECOND UNOPPOSED  
MOTION FOR EXTENSION OF TIME TO  
FILE A REPLY BRIEF TO DEFENDANTS  
HILV FEE, LLC AND NAV-115 E.  
TROPICANA, LLC'S RESPONSE IN  
OPPOSITION TO PLAINTIFF'S MOTION TO  
ADD CLAIM/AMEND PLEADINGS [DE 86]**

NOW COMES Plaintiff, Steve Johnson ("Plaintiff"), by and through  
the undersigned, and hereby submits this Second Unopposed Motion for  
Extension of Time to File a Reply Brief to Defendants' HILV Fee, LLC and  
NAV-115 E. Tropicana, LLC's Response in Opposition to Plaintiff's Motion

1 to Add Claim/Amend Pleadings [DE 86] (the "Motion for Extension of Time")  
2 pursuant to Rule 6(b) of the Federal Rules of Civil Procedure ("FRCP").

3 In support of this motion, Plaintiff shows unto the Court the  
4 following:

5 1. Plaintiff was served with Defendants' Response in Opposition to  
6 Plaintiff's Motion to Add Claim/Amend Pleadings (the "Opposition") [DE  
7 86] on May 18, 2020.

8 2. Plaintiff's reply brief was due by 11:59 pm PST on May 25, 2020;  
9 however, because May 25, 2020, was a federal/national holiday, the date  
10 to file the reply brief was automatically extended to 11:59 pm PST on  
11 May 26, 2020. The time for Plaintiff to reply to the Opposition therefore  
12 has not yet expired.

13 3. Due to an appellate brief deadline before the Eleventh Circuit  
14 Court of Appeals, which also due on or around May 26, 2020, Plaintiff's  
15 counsel was unable to devote the necessary time to complete the Reply  
16 brief.

17 4. Plaintiff's counsel spoke with counsel for Defendant HILV Fee,  
18 LLC and NAV-115 E. Tropicana, LLC (collectively, the "Hooters  
19 Defendants"), and explained the situation to them and his desired  
20 request for a brief extension of time of one-week to file a Reply.

21 5. Counsel for the Hooters Defendants confirmed that they had no  
22 objection to the extension of time and confirmed such via email on May  
23 26, 2020.

24 4. Due to a medical issue a medical issue (thankfully, not COVID-  
25 19 related) and the current events of our country, which led to  
26

1 closures of the undersigned's office over the weekend, the undersigned  
2 contacted counsel for the Hooters Defendants' to inquire into their  
3 amenability to granting Plaintiff a 24-hour extension in which to file  
4 his Reply brief.

5 5. Opposing counsel graciously proposed that the undersigned take  
6 until the end of the week (Friday, June 5, 2020) to file Plaintiff's  
7 reply brief, to which the undersigned accepted.

8 6. Pursuant to the approve-extension of time by opposing counsel,  
9 Plaintiff seeks to have until 11:59 pm PST to complete and file his  
10 Reply brief.

11 7. This motion is made in good-faith and not for the purpose of  
12 causing any needless and/or undue delay.

13 **WHEREFORE**, Plaintiff respectfully requests that this Court grant  
14 his motion and permit Plaintiff with an extension of time, up to and  
15 including, the 5th day of June, 2020, in which to file and serve a Reply  
16 to the Opposition.

17 Respectfully submitted,

The Williams Law Group

18 Dated: June 1, 2020

19 BY: Andrew Williams

20 ANDREW WILLIAMS, ESQ.

21 CA bar #: 310526 - pro hac vice admit

22 6273 Sunset Drive, Suite D-3

23 South Miami, Florida 33143

24 Telephone: (305) 916-1122

25 Email: Andrew@TheWilliamsLG.com

26 **IT IS SO ORDERED**

27 **DATED: June 05, 2020**

DAVID LEE PHILLIPS, ESQ.

NV bar #: 538 - local counsel

700 S. 4<sup>th</sup> Street

Las Vegas, NV 89101

Telephone: (702) 595-9097

Email: [DavidLeePhillips@aol.com](mailto:DavidLeePhillips@aol.com)

  
**BRENDA WEKSLER**

Attorneys for Plaintiff Steve Johnson

**UNITED STATES MAGISTRATE JUDGE**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 1st day of June 2020, a copy of the foregoing **PLAINTIFF'S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A REPLY BRIEF TO DEFENDANTS HILV FEE, LLC AND NAV-115 E. TROPICANA, LLC'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION TO ADD CLAIM/AMEND PLEADINGS [DE 86]**, was served electronically and sent to the following address/individuals:

**TYSON & MENDES, LLP**

THOMAS E. MCGRATH, ESQ.

CHRISTOPHER A. LUND, ESQ.

3960 Howard Hughes Parkway

Suite 600

Las Vegas, NV 89169

Email: [clund@tysonmendes.com](mailto:clund@tysonmendes.com)

*Attorneys for Defendants: HILV*

*Fee, LLC and NAV-115 E.*

*Tropicana, LLC*

/s/Andrew Williams

The Williams Law Group